

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS  
ANTIRUST LITIGATION

12-md-02311  
Honorable Marianne O. Battani

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ALL PARTS )  
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 )  
THIS RELATES TO: ALL CASES )  
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**MOTION FOR RELIEF FROM OBLIGATION TO  
SPECIFY LOCAL COUNSEL BY DEFENDANTS MITSUBISHI ELECTRIC  
CORPORATION, MITSUBISHI ELECTRIC US HOLDINGS, INC. AND  
MITSUBISHI ELECTRIC AUTOMOTIVE AMERICA, INC.**

Defendants Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc. and Mitsubishi Electric Automotive America, Inc. (the "Mitsubishi Electric Defendants") respectfully request that this Court waive the Michigan license requirements of Local Rule 83.20(f) and allow the Mitsubishi Electric Defendants to designate New York attorney David Wawro of Torys LLP as their special counsel of record without specifying additional local counsel.

Local Rule 83.20(f) requires that a party to litigation designate a local counsel of record who is an active member of the State Bar of Michigan, unless the Court waives this requirement. The Mitsubishi Electric Defendants believe a waiver is appropriate in this instance for several reasons.

*First*, Mr. Wawro is appearing on behalf of the Mitsubishi Electric Defendants for a special and limited purpose. Mr. Wawro will represent the Mitsubishi Electric Defendants with respect to the service of subpoenas on original equipment manufacturers with whom the

Mitsubishi Electric Defendants' principal counsel in these cases have a conflict. In all other respects, the Mitsubishi Electric Defendants continue to be represented by Zausmer, August & Caldwell, P.C., with offices in Farmington Hills, Michigan, and Jenner & Block LLP.

*Second*, the designation of Mr. Wawro as the Mitsubishi Electric Defendants' special counsel promotes efficiency and draws upon the institutional knowledge of Torys LLP, which represents two of the Mitsubishi Electric Defendants and a Canadian affiliate in numerous related Canadian auto parts antitrust lawsuits.

*Third*, Mr. Wawro has been a member of the Bar of the United States District Court for the Eastern District of Michigan since November 2004 and has been lead counsel on several cases filed in this District. Mr. Wawro has been a member of the New York bar in good standing since 1978. He is also a member of the bars of the United States Supreme Court, the United States Court of Appeals for the First, Second, Third, Sixth, Ninth and Federal Circuits and the United States District Court for the Southern District of New York, the Eastern District of New York, the Northern District of New York and the Western District of New York.

Mr. Wawro commits to assume full authority and responsibility for the special and limited purpose for which he is representing the Mitsubishi Electric Defendants and will appear in court as may be required.

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A proposed Order is tendered for the Court's convenience.

I certify that the foregoing is true and correct.

July 17, 2015

s/David Wawro

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*Attorneys for Defendants Mitsubishi Electric Corporation, Mitsubishi Electric Holdings US, Inc. and Mitsubishi Electric Automotive America, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the July 17, 2015, I electronically filed the foregoing MOTION FOR RELIEF FROM OBLIGATION TO SPECIFY LOCAL COUNSEL with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record via electronic mail.

Respectfully submitted,

TORYS LLP

By: /s/ David Wawro

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